

NEELEMEN LAW GROUP
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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

In re:

HWC Burbs Burgers, LLC

Debtor-in-Possession.

Chapter 11

Case No. 23-11919

**APPLICATION TO EMPLOY NEELEMAN LAW GROUP
AS LEGAL COUNSEL FOR THE ESTATE**

HWC Burbs Burgers, LLC (“Debtor”), applies to this Court, pursuant to 11 U.S.C. Section 327, for an order authorizing the employment of Neeleman Law Group as legal counsel for the estate of the Debtor.

In support of this application, the Debtor respectfully represents:

1. On October 9, 2023, the Debtor, filed a voluntary petition under Chapter 11, Sub V, of Title 11 of the United States Code.

2. The Debtor seeks authority to appoint Neeleman Law Group as legal counsel for the estate. Neeleman Law Group, P.C. has the expertise necessary to perform legal services for and on behalf of the Debtor and the bankruptcy estate. The employment is necessary as the Debtor is a corporation and must be represented by counsel. Attached to this Application is a copy of the Engagement Letter marked as Exhibit “A”.

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1 3. The professional services that Neeleman Law Group will render to the estate
2 include:

- 3 a. Assisting the Debtor in the investigation of the financial affairs of the estate;
4 b. Providing legal advice and assistance to the Debtor with respect to matters
5 relating to this case and creditor distribution;
6 c. Preparing all pleadings necessary for proceedings arising under this case; and
7 d. Performing all necessary legal services for the estate in relation to this case.

8 4. Neeleman Law Group will charge its standard rate, more specifically \$550.00 per
9 hour for attorney fees for principals, associate's rate of \$450.00.00 per hour and \$200.00 per
10 hour for paralegal fees, for services rendered and will seek reimbursement for costs and expenses
11 incurred in relation to representation of the estate.

12 5. As stated in the concurrently filed Declaration of Jennifer L. Neeleman,
13 Neeleman Law Group believes that it and its attorneys, (a), do not hold or represent any interest
14 adverse to the interests of the estates, and (b) are disinterested persons within the meaning of 11
15 U.S.C. Section 101.

16 6. Neeleman Law Group received a retainer of \$10,000.00 from regular business
17 income paid directly to counsel, a portion of which was used to pay the filing fee required for the
18 Chapter 11 case, in the amount of \$1,738.00. Neeleman Law Group applied \$5,000.00 to legal
19 services rendered and costs incurred prior to but in connection with this bankruptcy case. The
20 remaining amount of \$3,262.00 is currently held in trust to be applied to post-petition services
21 pending further court order.

22 7. Neeleman Law Group will submit interim and final applications for post-petition
23 compensation and reimbursement in accordance with all orders of the Court and other applicable
24 laws and rules.

25 8. Additional sums that may come due, as approved by the Court, will be paid
26 through the Debtor's plan. Neeleman Law Group will submit final applications for

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1 compensation and reimbursement in accordance with all orders of the Court and other applicable
2 laws and rules.

3 9. Neeleman Law Group does not hold a pre-petition claim against the Debtor and
4 does not hold an administrative claim for the bankruptcy preparation performed immediately
5 prior to filing.

6 10. This application is supported by the Declaration of Jennifer L. Neeleman filed
7 herewith.

8 BASED on the foregoing, the Debtor respectfully request the Court's authorization to
9 appoint and employ Neeleman Law Group as counsel for the estate.

10 Dated this 15th day of November, 2023

11
12 /s/ Joshua Henderson
13 Joshua Henderson – Managing Member
14 HWC Burbs Burgers, LLC

15
16 /s/ Jennifer L. Neeleman
17 WSBA No. 37374

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